

-----		
AU NEW HAVEN, LLC, and	:	
TRELLEBORG COATED SYSTEMS US, INC.,	:	
	:	
Plaintiffs,	:	CIVIL ACTION NO.
	:	15-CV-03411-GHW
	:	
v.	:	<b>PLAINTIFFS' MOTION TO</b>
	:	<b>ENJOIN DEFENDANT YKK</b>
YKK CORPORATION,	:	<b>CORPORATION FROM</b>
	:	<b>MAINTAINING ITS</b>
Defendant.	:	<b>DECLARATORY JUDGMENT</b>
-----		<b>ACTION IN JAPAN</b>

**PLEASE TAKE NOTICE** that the undersigned attorneys for Plaintiffs AU New Haven, LLC and Trelleborg Coated Systems, US, Inc. hereby move before the United States District Court for the Southern District of New York, Honorable Gregory H. Woods, for an Order enjoining Defendants YKK Corporation and its affiliates from maintaining its declaratory judgment action in the Tokyo District Court, Japan.

1

Respectfully submitted,

Dated: January 12, 2018

By: s/ norman h. zivin

Norman H. Zivin (NZ-6053)

Tonia A. Sayour (TS-7208)

COOPER & DUNHAM LLP

30 Rockefeller Plaza

New York, New York 10112

Tel.: (212) 278-0400

Fax: (212) 391-0525

Email: [nzivin@cooperdunham.com](mailto:nzivin@cooperdunham.com)

Email: [tsayour@cooperdunham.com](mailto:tsayour@cooperdunham.com)

and

Brian P. Daniels (pro hac vice)

Sean M. Fisher (SF0251)

David R. Schaefer (pro hac vice)

Michael Cretella (pro hac vice)

BRENNER, SALTZMAN & WALLMAN LLP

271 Whitney Avenue

New Haven, CT 06511

Tel.: (203) 772-2600

Fax: (203) 562-2098

Email: [bpdaniels@bswlaw.com](mailto:bpdaniels@bswlaw.com)

Email: [dschaefer@bswlaw.com](mailto:dschaefer@bswlaw.com)

Email: [sfisher@bswlaw.com](mailto:sfisher@bswlaw.com)

Email: [mcretella@bswlaw.com](mailto:mcretella@bswlaw.com)

Attorneys for Plaintiffs

### **CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on January 12, 2018, per Local Rule Civil Rule 5.2.

*s/ norman h. zivin*  
Norman H. Zivin